

EFFECTIVE

March 1, 2020.

Subject(s)**APL 68E-20, Data Privacy and Security Sanctions Policy**

The State of Michigan and the Michigan Department of Health and Human Services (MDHHS) apply appropriate sanctions against workforce members who fail to comply with data privacy and security policies and procedures controlling the appropriate access, use, or disclosure of Protected Health Information (PHI) in accordance with applicable laws and regulations.

Sanctions may include, but are not limited to, training, written counseling, written reprimand, unpaid suspension, interim service rating, demotion or termination for workforce members found to have violated this.

A person who knowingly obtains or discloses individually identifiable health information may face criminal and civil penalties under federal and state law.

Except where otherwise required by law, the type of sanction administered by MDHHS will depend on the facts and circumstances of each case. Human resources determine the appropriate sanction and will work with the impacted departments, Compliance and Data Governance, and MDHHS Legal Affairs.

Reason: Policy review and update.

**MANUAL
MAINTENANCE
INSTRUCTIONS**

Changed Items ...

[APL 68E-020](#)